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August 9, 2022

VIA ELECTRONIC FILING

The Honorable Lewis Kaplan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Securities and Exchange Commission v. Medallion Financial Corp., et al.*,  
No. 1:21-cv-11125

Dear Judge Kaplan:

We are counsel for Defendants Medallion Financial Corp. and Andrew Murstein in this action. I write on behalf of all parties, including our clients, Defendants Lawrence Meyers and Ichabod's Cranium, Inc., and Plaintiff Securities and Exchange Commission, to make the following request for the Court's consideration.

All parties have communicated and reached agreement that a stay of discovery would be warranted in the above-referenced action, pending the Court's decision on the motions to dismiss, filed by Defendants on August 5 and 6, 2022, with limited carve-outs to allow for certain discrete categories of discovery during the stay. Among other things, the parties will continue to "meet and confer" to resolve existing document discovery disputes, the parties went forward with a non-party witness deposition already scheduled for today, and the parties agree that third-party document discovery may continue. In light of the foregoing, the parties respectfully request the Court's endorsement of the enclosed Stipulation and [Proposed] Order.<sup>1</sup>

As always, we appreciate Your Honor's consideration.

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

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<sup>1</sup> The parties also reached agreement on a Stipulation and [Proposed] Confidentiality Order to govern document production in this action for the Court's consideration. A copy of that Stipulation and [Proposed] Confidentiality Order was filed last month and appears at Dkt. No. 65.

GIBSON DUNN

The Honorable Lewis Kaplan  
August 9, 2022  
Page 2

Enclosure

cc: All counsel of record (by ECF)